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Tariq Ahmad
3550 Barron Way Suite 13a
Reno, NV 89511
Plaintiff Pro Se

UNITED STATES DISTRICT COURT**DISTRICT OF NEVADA**
 and Amount \$ 402.00 Date 12/28/20

 Receipt # NVRNO Initials AB
5124

Tariq Ahmad,
Plaintiff,

Case 3:20-cv-00717

Graco Fishing & Tools Inc. and Does 1-10
inclusive
Defendants.

**COMPLAINT FOR
FRAUD
COMMERICAL BRIBERY
JURY DEMAND**

Plaintiff Tariq Ahmad ("Ahmad") files his complaint against defendants listed below and alleges as follows:

Parties and Jurisdiction

1. Plaintiff is a resident of the State of Nevada.
2. Pacific Energy & Mining Co., ("Pacific") is a Nevada Corporation.
3. Defendant Jim Fulkerson ("Fulkerson") is a resident of the State of Utah.
4. Graco Fishing & Rental Tools Inc. ("Graco") is a Texas Corporation.
5. Plaintiff does not know the true names or capacities of the defendants sued herein as DOES 1 through 10; therefore, Plaintiff sues said defendants by such fictitious names, and prays leave that when the true names of said defendants are ascertained, they may be

1 inserted with appropriate allegations. Plaintiff is informed and believes, and upon such
2 information and belief, allege that each of the defendants designated herein by such fictitious
3 names is responsible in some manner for the events and happenings hereinafter referred to and
4 that such conduct of said defendants caused injury and damages proximately thereby to
5 Plaintiff. Upon learning the true names and identities of DOES 1 through 10, Plaintiff will seek
6 leave of court to amend this Claim.

7 6. At all times relevant herein, defendants, and each of them, were the agents and
8 employees of each of the remaining defendants, and were at all times acting within the course
9 and scope of said agency and employment, and each defendant has ratified and approved the
10 acts of the other. Therefore, each defendant is liable for the acts of each remaining third party
11 defendant/cross-defendant.

12 7. That the conduct of each and every defendant ratified and adopted by each and
13 every other defendant in this action.

14 8. The corporate defendants, and each of them, were acting by and through their
15 authorized employees, agents, and/or representatives, who were acting within the scope and
16 course of said capacity, and whose conduct was ratified by each of said third party defendants.

17 9. That Graco was contracted to perform work on the Well known as the
18 Greentown Federal 26-43H, located in Grand County, Utah ("The Well").

19 10. Plaintiff is the President of Pacific.

20 11. Plaintiff has an interest in the Well.

21 12. Defendant Fulkerson on behalf of Graco had submitted a fixed price bid to
22 Pacific.

23 13. Fulkerson confirmed the fixed price bid to Pacific and others.

24 14. Graco caused a breach of the Well operated by Pacific.

25 15. At the time the breach was made Fulkerson was the supervisor and employee of
26 Graco.

25. Due to the actions of Defendant Fulkerson and others Plaintiff was damaged.

SECOND CLAIM FOR

28. Defendant Fulkerson received a bribe from Graco and others in order to change the facts on the fixed bid contract and the cause of the breach

29. Based upon the bribe Defendant Fulkerson gave false testimony.

30. Defendant's false testimony resulted in a judgement against plaintiff.

31. Damages to Plaintiff exceed the minim amount for jurisdiction of this court.

1. For general damages according to proof at trial, trebled according to statute.
2. Pre judgement interest according to statute; and
3. For general damages according to statute; and
4. Punitive damages

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DATED: December 23, 2020



Tariq Ahmad Pro Per